

Comments

Caithness and Sutherland Proposed Local Development Plan (CaSPlan) Consultation (22/01/16 to 18/03/16)

Comment by	Scottish Government (Scottish Government)
Comment ID	
Response Date	15/03/16 10:26
Consultation Point	Employment (View)
Status	Draft
Submission Type	Web
Version	0.1

Please tell us what your comment relates to: An objection to this part of the Plan

Please state what you are objecting to and what modifications you seek for the Plan:

Paragraphs 65-67: Status of National Marine Plan. We welcome the references made to the National Marine Plan. However, the Proposed Plan is not clear on the status of the National Marine Plan, the role it will play in decision making and its relationship with non-statutory marine plans. This section of the plan should be amended to reflect this. Modifications Sought: Paragraph 65 should be amended and brought together with the final sentence of Paragraph 67 to read: "The policy framework for marine planning is evolving at both national and regional levels with the publication of the National Marine Plan (March 2015) and the development of Regional Marine Plans. The National Marine Plan applies from Mean High Water Springs and covers both Scottish inshore waters (out to 12 nautical miles) and offshore waters (12 to 200 nautical miles). The National Marine Plan has statutory effect for any public authority taking decisions which can affect the marine area. Statutory Regional Marine Plans will be delivered by Marine Planning Partnerships once established. The Council, in partnership with Marine Scotland and Orkney Islands Council, is also developing a non-statutory Pilot Pentland Firth and Orkney Waters Marine Spatial Plan which will be used as a material consideration in assessing relevant planning applications along the north Caithness and Sutherland coastline. Key elements....." If this change is accepted by the Reporter, it is suggested that the first sentence of Paragraph 67 which reads "The HwLDP includes policy in support of marine renewables, aquaculture, the integration of coastal and marine planning and links to relevant supplementary guidance" is moved to follow the last sentence of Paragraph 66.

Comment by	Scottish Government (Scottish Government)
Comment ID	
Response Date	15/03/16 11:06
Consultation Point	Policy 1: Town Centres First (View)
Status	Draft

Submission Type Web

Version 0.1

Please tell us what your comment relates to: An objection to this part of the Plan

Please state what you are objecting to and what modifications you seek for the Plan:

Pages 9-10. Text related to Policy 1 Town Centres First. Representation: There does not appear to be reference to town centre strategies within the Proposed CaSPlan, or its proposed Action Programme. Scottish Planning Policy (SPP) (paragraphs 64- 65) expects Local authorities, working with community planning partners, businesses and community groups as appropriate, should prepare a town centre health check. Following that, town centre strategies should be developed to deliver improvements to the town centre. SPP states (in paragraph 66) that the spatial elements of town centre strategies should be included in the development plan or supplementary guidance. We would wish to see the inclusion of a 'hook' or 'connection' in the development plan, to allow the spatial elements of the town centre strategies to be developed into supplementary guidance as and when they are prepared. This will allow the spatial elements of the eventual town centre strategies to gain the formal status of being part of the development plan as envisaged in SPP. The Scottish Government would also like to see commitment in the Action Programme that the Council will, in line with SPP, progress the development of town centre health checks and strategies. Modifications Sought: • Amend the plan to provide a suitable statement to set out that, following the preparation of town centre health checks, town centre strategies will be prepared to deliver improvements to the town centres, and that Supplementary Guidance will be brought forward to cover the spatial elements of town centre strategies. - This statement should provide a suitable connection between the LDP and the supplementary guidance, as required by Regulation 27 of The Town and Country Planning (Development Planning) (Scotland) Regulations 2008. - It would be appropriate to include this statement with paragraphs 38 or 39 on town centres. • Insert into the Action Programme a new action setting out that the Council will carry out town centre health checks and develop town centre strategies and Supplementary Guidance.

Comment by Scottish Government (Scottish Government)

Comment ID

Response Date 16/03/16 14:01

Consultation Point Make your comments ([View](#))

Status Draft

Submission Type Web

Version 0.1

Please tell us what your comment relates to: An objection to this part of the Plan

Please state what you are objecting to and what modifications you seek for the Plan:

Objection: Thurso - Settlement Statement Text and Map The Proposed Plan Settlement Statement Map for Thurso includes indicative lines for potential routes and road connections with the A9 trunk road. However, there is no information on the appraisal and rationale for the new links and neither are there details on funding, phasing or delivery provided in the Proposed Plan. The Proposed Plan and accompanying Action Programme do not give a clear understanding of what is required to provide access to the new development areas, what is being suggested to alleviate the issues highlighted in the town centre or what steps will be taken to better understand the options. The indication of potential routes and the policy protecting land at this early stage of considering options are therefore considered to be premature and does not accord with SPP paragraphs 274 / 275. Modifications Sought: Transport Scotland advises that the need for any alternative routes around Thurso connecting with the trunk

road should be established through a robust appraisal exercise. This position was previously stated in response to the Main Issues Report consultation. This type of appraisal would assess all modes of travel as part of an objective led approach. The identification of transport interventions should result from the assessment of evidence based transport problems and opportunities of a specific area. A range of transport alternatives should be considered and not focussed on a particular solution.

Comment by Scottish Government (Scottish Government)

Comment ID

Response Date 18/03/16 09:23

Consultation Point Growing Communities ([View](#))

Status Draft

Submission Type Web

Version 0.1

Please tell us what your comment relates to: An objection to this part of the Plan

Please state what you are objecting to and what modifications you seek for the Plan:

Housing Representations Objection 1 - Paragraph 21 - Presentation of Housing Figures - Paragraph 21 refers to the total Housing Supply Target (HST) for the Caithness and Sutherland area (1,140), but the terminology is not clear in the table below Paragraph 22 (pg 6) of the Proposed Plan. Modification Sought: The table should be amended to include the heading 'Housing Supply Target 2015-2020 and 2015-2035'. Table 4 of the recently published Draft Planning Delivery Advice: Housing and Infrastructure which provides guidance on how the key aspects of housing figures (HST and HLR) should be presented in Local Development Plans (outwith city regions). Objection 2 - Paragraph 24 - Presentation of Housing Figures and Terminology - This paragraph states that a generous housing land supply has been included in the plan, and that the 'total land allocated' for housing is 1,498. This appears to be the total 'Housing Land Requirement' (HLR) for the Caithness and Sutherland Area, but this is not clear. Modification Sought: The wording 'total land allocated' should be amended in Paragraph 24 to 'Housing Land Requirement' to reflect the established terminology used in Scottish Planning Policy. In addition to this, the table on page 6 of the Proposed Plan should be amended to include an additional column on the Housing Land Requirement for the periods 2015-2020 and 2015-2035. Table 4 of the recently published Draft Planning Delivery Advice: Housing and Infrastructure which provides guidance on how the key aspects of housing figures (HST and HLR) should be presented in Local Development Plans (outwith city regions). Objection 3: Paragraph 24 - Generosity: It appears that a generous margin of 31.4% (358 homes) has been added to the HST (1140) to arrive at a HLR of 1498 homes. However, this is not clearly explained within Paragraph 24. Modification Sought: The reasoning for choosing this level of generosity should be clearly explained in the Proposed Plan. Paragraph 116 requires that a robust explanation should be provided in the plan.